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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
LEED ENVIRONMENTAL, INC.**

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May 2, 2000

Telecopy and First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Voluntary Progress Report 12 (April 2000)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during April 2000.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- During April 2000, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), continued to perform remedial activities. Tasks performed by ENTACT in April 2000 included miscellaneous restoration activities at the main industrial site and residential lots. Through April 2000, ENTACT has completed remedial activities at 765 residential lots and 32 remote fill lots.
- During April 2000, ARCADIS Geraghty & Miller ("ARCADIS") continued field activities associated with the pre-design investigation for groundwater. ARCADIS personnel and Group representatives also continued efforts to secure access to off-site properties for installation and sampling of groundwater monitoring wells.



- On April 3, 2000, a progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, the Army Corps of Engineers ("ACOE"), ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on April 4, 2000 to document the results of the meeting.
- On April 5, 2000, the Group's project coordinator provided a letter to EPA to supplement ARCADIS' March 31, 2000 letter and to update EPA on the status of the Group's continuing efforts to secure access to off-site properties for installation of monitoring wells associated with the remedial design for groundwater.
- On April 7, 2000, the Group's project coordinator issued a voluntary progress report to EPA.
- On April 7, 2000, the Group's project coordinator provided a letter to EPA to confirm that ARCADIS planned to remobilize to the site on April 10, 2000 to collect the second round of groundwater samples from monitoring wells located on those properties where access has been obtained from property owners.
- During the period from April 10 - April 13, 2000, ARCADIS personnel completed the collection of the second round of groundwater samples from existing and newly installed monitoring wells at the main industrial site and off-site areas where access has been obtained. Samples were submitted to the laboratory for analysis.
- On April 17, 2000, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on April 19, 2000 to document the results of the meeting.
- On April 18, 2000, the Group's project coordinator issued a letter to EPA to provide a tabulated summary of the data from laboratory analysis of groundwater samples collected at the site by ARCADIS personnel during the period from March 20 - 25, 2000.
- On April 21, 2000, ARCADIS received a copy of an executed access agreement from Granite City Steel.
- On April 21, 2000, ARCADIS received comments on the access agreement from the Terminal Railroad Association of St. Louis. ARCADIS personnel and the Group initiated efforts to evaluate the comments.

- On April 27, 2000, the Group's project coordinator provided a letter to EPA which included a revised spreadsheet to correct a laboratory data reporting error for the mercury concentration in MW-106D (BU) which had been reported to EPA on April 18, 2000.

2. Summary of Data and/or Results of Sampling and Tests Received:

- As noted above, laboratory data from groundwater monitoring activities were submitted to EPA on April 18 and April 27, 2000.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:

- Not applicable for this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- At the present time, the Group anticipates that ENTACT will complete remaining field activities associated with remediation of residential lots, remote fill lots, and the Taracorp pile. After those activities (including Slough Road, street sweeping, and other tasks) have been completed, ENTACT will demobilize its equipment and personnel from the site. ENTACT will continue efforts to prepare final reports to summarize the remedial activities which were performed at the site.
- ARCADIS personnel will continue to perform predesign field investigation activities for groundwater at those properties for which access has been obtained. Laboratory data from groundwater sampling completed on April 13, 2000 will be received, provided to EPA, and validated. The Group's Technical Committee anticipates that a meeting will be held with EPA to discuss the data. EPA will be advised of the Group's continuing efforts.
- ARCADIS personnel and representatives of the Group's Technical Committee will continue efforts to secure access to off-site properties for installation and sampling of groundwater monitoring wells. EPA will be advised of the Group's continuing efforts.
- ARCADIS personnel will continue efforts to revise the Predesign Investigation Work Plan for Groundwater to address EPA's comments. Finalization of the Predesign Investigation Work Plan has been delayed pending resolution of access issues associated with the proposed monitoring well installations and confirmation of final locations for the new wells.

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5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As noted above, the Group and ARCADIS have encountered difficulties in securing access to properties for installation of monitoring wells. ARCADIS personnel issued a letter to EPA on March 31, 2000 to document efforts to secure access. This letter was supplemented by an April 5, 2000 letter which was provided to EPA by the Group's project coordinator. The current status of the Group's efforts to secure access is summarized in Table 1.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

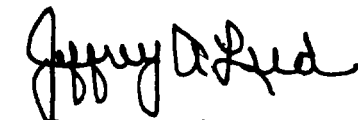
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- As requested by EPA, the Group and ENTACT will support EPA's efforts to hold a media event at the site in May 2000.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

attachment

cc: Ms. Sandra Bron - Illinois EPA (w/attachment, by first class mail)
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller
(w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)

TABLE 1
NL INDUSTRIES/TARACORP SUPERFUND SITE
STATUS OF ACCESS TO PROPERTIES FOR PREDESIGN INVESTIGATION FOR GROUNDWATER

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 101		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 102		✓	Off-site (east of main industrial)		Aetna Freight Lines Inc. 1501 Grand Granite City, IL 62040		Property owner recently identified. Access agreement to be prepared.
MW 103		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 103-91		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 104		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 104-92		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 105D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 1 (continued)
Status of Access to Properties for Predesign Investigation for Groundwater

May 2, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 105S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 108 D		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

May 2, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 108 S		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 109-92		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 110		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 111-92		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 108 X	✓		Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109 X	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

May 2, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 112	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
GMMW-113	✓		Main industrial (opposite side of State Street from State Street Warehouse)	22-2-19-24-15-401-006 22-2-19-24-15-401-007	John G. Obucina 1460 State Street Granite City, IL 62040	John G. Obucina 15th & State Streets Granite City, IL 62040	Access agreement issued on 12/17/99.
GMMW-113	✓						Access agreement issued to the City of Granite City in January 2000. Approval (right- of-way permit) has been obtained from Granite City for well installation
GMMW-114	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorpora- ted into access agree- ment sent to National Steel Corp. on 12/17/99. Based upon discussions with Mr. Carl Cannon, National Steel Corp., a revised access agree- ment was sent to Mr. Cannon on 3/29/00. A signed access agreement was received by ARCADIS Geraghty & Miller on 4/21/00.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

May 2, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-115	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99. Based upon discussions with Mr. Carl Cannon, National Steel Corp., a revised access agreement was sent to Mr. Cannon on 3/29/00. A signed access agreement was received by ARCADIS Geraghty & Miller on 4/21/00.
GMMW-116	✓		Main industrial		Terminal Railroad Assoc. of St. Louis 700 North Second Street St. Louis, MO 63102		Based upon discussions with Mr. Carl Cannon, National Steel Corp., the proposed monitoring well was located to adjacent property. An access agreement was sent to the Terminal Railroad Association of St. Louis on 3/31/00. Comments on the access agreement were received by ARCADIS Geraghty & Miller on 4/21/00.
GMMW-117	✓		Venice Township	21-1-19-25-00-000-009	Bissell Street Warehouse Co. 1226 Bissell Avenue Venice, IL 62090	Bissell Street Warehouse Co. Highway 3/P.O. Box C Madison, IL 62060	Access agreement issued on 12/17/99. Access agreement signed by Brian Kearns, Bissell Street Warehouse Co., on 12/31/99.
GMMW-118	✓		Venice Township	21-2-19-35-15-401-906.000	Gulf Mobile Ohio RR Kerr Street Venice, IL 62090	Illinois Cental RR 455 North Cityfront Plaza Dr. Chicago, IL 60611	Access agreement issued on 12/17/99.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

May 2, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-118	✓		Venice Township		Right-of-way on south side of Kerr Street (approx. 200 feet east of intersection of Kerr Street and Main Street)	City of Venice, City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, the City of Venice authorized well installation at a city council meeting.
GMMW-119	✓		Venice Township	21-2-19-35-00-000-011.T00 21-2-19-35-00-000-012.T00	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Access agreement issued on 12/17/99.
GMMW-119	✓		Venice Township		Right-of-way on the east side of 4 th Street (approximately 100 feet south of intersection of 4 th Street and Granville Street)	City of Venice City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, City of Venice authorized well installation at city council mtg.
GMMW-120	✓		Eagle Park Acres	21-1-19-36-08-201-004	Eagle Park Acres Imp. Assn Hill Street Madison, IL 62060	Eagle Park Acres Imp. Assn. P.O. Box 385 Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement received from Sarah B. Page-Collins 1/31/00. Also, a right-of-way permit authorization for monitoring well installation has been received from Madison County Highway Department.
GMMW-121	✓		Eagle Park Acres	21-2-19-36-16-401-036	Bobby L. & Verillian Ervin 214 Watson Street Madison, IL 62060	Bobby L. & Verillian Ervin 212 Watson Street Madison, IL 62060	Access agreement issued on 12/17/99.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

May 2, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-121 (continued)					Northern parkway of Mary Street, south of Watson Street		A right-of-way permit authorization for moni- toring well installation has been received from the Madison County Highway Department.
GMMW-122	✓		Eagle Park Acres	21-2-19-36-12-202-008	Willie R. Foster Earle Street Madison, IL 62060	Willie R. Foster 306 Terry Street Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement was received on 1/28/00.
					Northwest side of Earle Street, south of Allen Street		A right-of-way permit authorization for moni- toring well installation has been received from the Madison County Highway Department.
GMMW-123	✓		Main industrial	21-2-19-25-07-201-014	Martin and Baily, Inc. Madison Avenue Madison, IL 26060	Martin and Bailey, Inc. P.O. Box 385 Carmi, IL 62821	Access agreement issued on 12/17/99. Access agreement signed by Mark Bayley, Martin and Baily, Inc., on 12/24/99.
					Northside of 12th Street between Madison and Iowa Streets and alley between Madison and Iowa Streets, north of 12th Street, 200 feet		Access agreement hand- delivered on 1/11/00. City of Madison City Council has approved the request for access to the public right-of-way. A written agreement/ permit is not required, but the building inspec- tor must be contacted prior to drilling.

Table 1 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

May 2, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-124 GMMW-125	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access agreement issued on 12/17/99. Based upon discussions with Mr. Carl Cannon, National Steel Corp., a revised access agree- ment was sent to Mr. Cannon on 3/29/00. A signed access agreement was received by ARCADIS Geraghty & Miller on 4/21/00.